

**Exhibit A**

**Proposed Order**

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et*  
*al.*,

Debtors.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

This filing relates to the  
Commonwealth and ERS.

**ORDER GRANTING FOUR HUNDRED FIRST OMNIBUS OBJECTION (NON-  
SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO AND THE  
EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT OF THE  
COMMONWEALTH OF PUERTO RICO TO DUPLICATE CLAIMS**

Upon the *Four Hundred First Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Duplicate Claims* [ECF No. 19543] (the “Four Hundred First Omnibus Objection”),<sup>2</sup> filed by the Commonwealth of Puerto Rico (“Commonwealth”) and the

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Finaancing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5532-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Four Hundred First Omnibus Objection.

Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS,” and together with the Commonwealth, the “Debtors”), dated December 17, 2021, for entry of an order disallowing in their entirety certain claims filed against the Debtors, as more fully set forth in the Four Hundred First Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Four Hundred First Omnibus Objection and to grant the relief requested therein pursuant to PROMESA section 306(a); and venue being proper pursuant to PROMESA section 307(a); and due and proper notice of the Four Hundred First Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and each of the claims identified in the column titled “Claims to be Disallowed” in Exhibit A to the Four Hundred First Omnibus Objection (collectively, the “Claims to Be Disallowed”) being duplicative of the claims identified in the column titled “Remaining Claims” in Exhibit A (collectively, the “Remaining Claims”); and the Court having determined that the relief sought in the Four Hundred First Omnibus Objection is in the best interests of the Commonwealth, ERS, their creditors, and all parties in interest; and the Court having determined that the legal and factual bases set forth in the Four Hundred First Omnibus Objection establish just cause for the relief granted herein; and the Court having deemed a hearing is not necessary as no objection, responsive pleading, or request for a hearing with respect to the Four Hundred First Omnibus Objection has been submitted, and after due deliberation and sufficient cause appearing therefor, it is hereby

ORDERED that the Four Hundred First Omnibus Objection is GRANTED as set forth herein; and it is further

ORDERED that the Claims to Be Disallowed are hereby disallowed in their entirety; and it is further

ORDERED that the Debtors' right to object to the Remaining Claims is reserved;  
and it is further

ORDERED that Kroll, is authorized and directed to designate as expunged the  
Claims to Be Disallowed on the official claims registry in the Title III Cases; and it is further

ORDERED that this Order resolves Docket Entry No. 19543 in Case No. 17-3283;  
and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters  
arising from or related to the implementation, interpretation, or enforcement of this Order.

SO ORDERED.

Dated: \_\_\_\_\_

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Honorable Judge Laura Taylor Swain  
United States District Judge

**EXHIBIT A**

**Schedule of Claims Subject to the Four Hundred First Omnibus Objection**

Four Hundred First Omnibus Objection  
Exhibit A - Claims to Be Disallowed

CLAIMS TO BE DISALLOWED

REMAINING CLAIMS

NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
1 COLON OTERO, MYRNA L #9 URB RAMOS ANTONINI CIDRA, PR 00739	09/13/21	17 BK 03283-LTS / Commonwealth of Puerto Rico	179579	\$ 75,000.00	COLON OTERO, MYRNA L #9 URB. RAMOS ANTONINI CIDRA, PR 00739	09/13/21	17 BK 03283-LTS / Commonwealth of Puerto Rico	179584	\$ 75,000.00
Reason: Proof of Claim asserts liabilities which are duplicative of another filed Proof of Claim.									
2 GONZALEZ RIVERA, WILFREDO URB. PUERTO NUEVO 1207 CALLE 16 NE SAN JUAN, PR 00920	10/08/20	17 BK 03283-LTS / Commonwealth of Puerto Rico	178366	Undetermined*	GONZALEZ RIVERA, WILFREDO URB. PUERTO NUEVO 1207 CALLE 16 NE SAN JUAN, PR 00920	10/15/20	17 BK 03283-LTS / Commonwealth of Puerto Rico	177228	Undetermined*
Reason: Proof of Claim asserts liabilities which are duplicative of another filed Proof of Claim.									
3 MERCADO BAEZ, SONIA MANSION DEL SUR SF22 CAMINO DE LA ZARZUELA TOA BAJA, PR 00949	06/29/18	17 BK 03283-LTS / Commonwealth of Puerto Rico	151144	Undetermined*	MERCADO BAEZ, SONIA CAMINO ZARZUELA S F 22 MANSIONES SUR TOA BAJA, PR 00949	06/29/18	17 BK 03283-LTS / Commonwealth of Puerto Rico	109654	Undetermined*
Reason: Proof of Claim asserts liabilities which are duplicative of another filed Proof of Claim.									
4 MIGNUCCI SANTIAGO, CARMEN SOFIA PO BOX 367843 SAN JUAN, PR 00936	05/18/18	17 BK 03566-LTS / Employees Retirement System of the Government of the Commonwealth of Puerto Rico	17076	Undetermined*	MIGNUCCI SANTIAGO, CARMEN SOFIA PO BOX 367843 SAN JUAN, PR 00936-7843	05/18/18	17 BK 03566-LTS / Employees Retirement System of the Government of the Commonwealth of Puerto Rico	17518	Undetermined*
Reason: Proof of Claim asserts liabilities which are duplicative of another filed Proof of Claim.									
5 MIRANDA MAÑON, AIDA URB. DORAVILLE 99 CALLE MALAGA DORADO, PR 00646	02/14/20	17 BK 03283-LTS / Commonwealth of Puerto Rico	173304	\$ 5,200.00*	MIRANDA MAÑON, AIDA URB. DORAVILLE 99 CALLE MALAGA DORADO, PR 00646	02/14/20	17 BK 03283-LTS / Commonwealth of Puerto Rico	173576	\$ 5,200.00*
Reason: Proof of Claim asserts liabilities which are duplicative of another filed Proof of Claim.									

Four Hundred First Omnibus Objection  
Exhibit A - Claims to Be Disallowed

CLAIMS TO BE DISALLOWED

REMAINING CLAIMS

	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
6	NAZARIO CALDERON, JUAN 75 CALLE YULIN CONDOMINIO PUERTA DEL SOL APT 610 SAN JUAN, PR 00926	06/25/18	17 BK 03283-LTS / Commonwealth of Puerto Rico	89317	\$ 42,548.51*	NAZARIO CALDERON, JUAN 75 CALLE YULIN CONDOMINIO PUERTA DEL SOL APT 610 SAN JUAN, PR 00926	06/25/18	17 BK 03283-LTS / Commonwealth of Puerto Rico	51700	\$ 42,548.51*

Reason: Proof of Claim asserts liabilities which are duplicative of another filed Proof of Claim.